

III. REMARKS

1. Claims 1 and 18 are amended.

2. Applicants respectfully submit that claims 1-34 are patentable over the combination of Verdonk et al. (US 6,330,454, "Verdonk") and Vialen et al. (US 6,826,406, "Vialen") under 35 USC 103(a). Claim 1 recites in part the subscriber terminal transmitting a request message for location service pertaining to the subscriber terminal to the core network of the radio system via the radio network of the radio system. This feature is not disclosed or suggested by the combination of Verdonk and Vialen.

Column 5, lines 1-20 of Verdonk discloses the customer server 140 sending a location determination request to the SCP 142 (or SN 141). The location determination request is made by the customer server 140 to retrieve location information for mobile units 122, 126, 128, 130 (Col. 4, L. 41-44 and Col. 4, L. 54-65). Nowhere does Verdonk disclose or suggest that the customer server 140 transmits "a request message for location service pertaining to" itself. Applicant's claim 1 clearly recites "the subscriber terminal transmitting a request message for location service pertaining to the subscriber terminal to the core network of the radio system via the radio network of the radio system."

In Verdonk, upon the initiation of the location determination the customer server 140 sends a location determination request to the SCP 142 (or SN 141 via the packet data network 112 (Col. 5, L. 2-5). Operation of determining the location of the mobile unit commences at step 202 of Verdonk where the SCP receives a locate request for a subscriber, perhaps via a packet data network from a subscriber computer (i.e. the customer server) (Col. 6, L. 44-47). At step 402 of Verdonk the SCP or the originating MSC sends a locate request to the HLR, whether the SCP or the originating MSC sent the locate request depending upon the particular implementation (Col. 7, L. 53-57). At step 502, the SCP of Verdonk or the originating MSC sends a locate request to the HLR and at step 504 the HLR responds by sending a route request to the serving MSC, requesting location information for the mobile unit (Col. 8, L. 17-21). It is noted that the mobile unit whose location is being requested is identified by the customer server 140 when the request is made by including the MIN (or cellular telephone number) of the mobile unit (Col. 5,

L. 5-7). Nowhere does Verdonk disclose or suggest that a request is made by a subscriber terminal for location service pertaining to that subscriber terminal as called for in Applicant's claim 1. Verdonk merely discloses the customer server 140 making a request to the SCP 142 (or SN 141) for the location of a specified mobile unit 122, 126, 128, 130 and nothing more.

Combining Verdonk with Vialen fails to remedy the above-noted deficiency of Verdonk. Vialen pertains to reconfiguring a cellular radio network connection. Vialen is silent as to the subscriber terminal transmitting a request message for location service pertaining to the subscriber terminal to the core network of the radio system via the radio network of the radio system as recited in Applicant's claim 1.

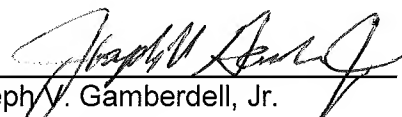
Thus, the combination of Verdonk and Vialen fails to disclose or suggest the subscriber terminal transmitting a request message for location service pertaining to the subscriber terminal to the core network of the radio system via the radio network of the radio system as recited in Applicant's claim 1. Therefore, claim 1 is patentable over the combination of Verdonk and Vialen.

Claim 18 is patentable over the combination of Verdonk and Vialen for reasons that are substantially similar to those described above with respect to claim 1. Claims 2-17 and 19-34 are patentable at least by reason of their respective dependencies.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,



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